

**UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE: Joseph Martin Thomas
Debtor.

Joseph Martin Thomas
Movant,
v.

PNC Bank, National Association;
Tax Collector, City of Erie; Erie County Tax Claim
Bureau; United States of America, Internal Revenue
Service; Commonwealth of Pennsylvania, Dept. of
Revenue; and Dale E. Pehrsson and Robert S. Pehrsson
Respondents.

Case No. 20-10334 TPA

Judge Thomas P. Agresti

Chapter 11

Date and Time of Hearing:
June 3, 2021 at 11:30 a.m.

Response Deadline:
May 24, 2021

**NON-OPPOSITIONAL RESPONSE OF PNC BANK, NATIONAL ASSOCIATION
TO DEBTOR'S MOTION TO SELL**

Respondent, PNC Bank, National Association, by and through its counsel, KML Law Group, P.C., hereby responds to the Debtor's Motion to Sell as follows:

1. Respondent has reviewed the current motion to sell and the proposed form of order filed with the Court.
2. Respondent does not object to the motion or the proposed order in its current form.
3. However, should the proposed order be revised, or if the underlying facts supporting the motion should change, Respondent reserves its right to object to the motion.
4. Respondent's response, in its present form, is not an objection to the current motion to sell the subject property.
5. The undersigned does not intend to appear to prosecute an objection at this time unless the proposed order is amended to a form deemed objectionable.

/s/ Maria D. Miksich, Esquire

Maria D. Miksich, Esquire
KML Law Group, P.C.
701 Market Street, Suite 5000
Philadelphia, PA 19106-1532
(215) 627-1322
Attorney for Respondent

Date: May 26, 2021